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Attorneys for Defendants
SOLANO COUNTY SHERIFF'S OFFICE, COUNTY
OF SOLANO, DALTON MCCAMPBELL, LISA
MCDOWELL and ROY STOCKTON

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

NAKIA VICTORIA PORTER, an individual,
and JOE BERRY POWELL, JR., an
individual,,

Plaintiffs,

v.

SOLANO COUNTY SHERIFF'S OFFICE,
COUNTY OF SOLANO, DEPUTY DALTON
MCCAMPBELL, an individual, DEPUTY
LISA MCDOWELL, an individual, SGT.
ROY STOCKTON, an individual, and DOES
1 to 10, inclusive,

Defendants.

Case No. Case No.2:21-cv-01473-KJM-JDP

**STIPULATION AND ORDER TO FURTHER
EXTEND TIME TO RESPOND TO
COMPLAINT**

Eastern District Local Rule 144

Defendants SOLANO COUNTY SHERIFF'S OFFICE, COUNTY OF SOLANO,
DALTON MCCAMPBELL, LISA MCDOWELL and ROY STOCKTON (collectively
"Defendants") and plaintiffs NAKIA VICTORIA PORTER and JOE BERRY POWELL, JR.
(collectively "Plaintiffs") hereby stipulate to the following:

1. Pursuant to Eastern District Local Rule 144, Defendants and Plaintiffs hereby
stipulate to a further extension of time within which Defendants shall file a responsive pleading
to Plaintiffs' Complaint.

2. No Defendant is challenging service of the Complaint.

3. Defendants' original deadline to file a responsive pleading was October 19, 2021.

4. On October 11, 2021, the parties entered into a stipulation to extend the time for Defendants to file a responsive pleading to November 9, 2021. (ECF No. 5)

5. On November 8, 2021, the parties entered into a stipulation to further extend the time for Defendants to file a responsive pleading to November 16, 2021. (ECF No. 6)

6. On November 12, 2021, the parties entered into a stipulation to further extend the time for Defendants to file a responsive pleading to December 7, 2021. (ECF No. 8) On November 15, 2021, the court issued minute order granting the parties' stipulation. (ECF No. 9)

7. Counsel for Defendants and counsel for Plaintiffs are continuing their meet and confer process in connection with Plaintiffs' Complaint. Counsel for Plaintiffs has been continuing to experience very serious medical issues that have impeded counsel's ability to complete their meet and confer efforts.

8. Counsel have agreed to a brief additional extension of time for Defendants to respond to Plaintiffs' Complaint to allow the parties to conclude their meet and confer efforts, including a determination by counsel for Plaintiffs of whether to file an amended complaint. The parties' efforts are intended to avoid motion practice at this stage of the litigation, if possible. The responsive pleading on behalf of all named Defendants will be due on December 16, 2021.

9. Should Defendants choose to file a motion in response to the operative complaint, Defendants agree to set the motion for hearing at the earliest available date after January 31, 2022, subject to the availability of counsel and the Court.

IT IS HEREBY STIPULATED, pursuant to Eastern District Local Rule 144(a), that the deadline for all named Defendants to respond to Plaintiff's Complaint shall be December 16, 2021.

DATED: December 6, 2021

ALMADANI LAW

By: /s/ Yasin M. Almadani
YASIN M. ALMADANI
Attorneys for Plaintiffs
NAKIA VICTORIA PORTER and
JOE BERRY POWELL, JR.

1 DATED: December 6, 2021

2 SELMAN BREITMAN LLP

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4
5 By: /s/ *Danielle K. Lewis*

6 DANIELLE K. LEWIS

7 Attorneys for Defendants

8 SOLANO COUNTY SHERIFF'S

9 OFFICE, COUNTY OF SOLANO,

10 DALTON MCCAMPBELL, LISA

11 MCDOWELL and ROY STOCKTON

12 **FILER'S ATTESTATION**

13 I hereby attest that I have been authorized by plaintiff's counsel to show their signature on
14 this document as /s/.

15 DATED: December 6, 2021

16 /s/ *Danielle K. Lewis*

17 DANIELLE K. LEWIS

ORDER

The foregoing stipulation of the parties is approved, and IT IS SO ORDERED.

Defendant's response to Plaintiff's Complaint shall be filed on or before December 16, 2021.

DATED: December 8, 2021



CHIEF UNITED STATES DISTRICT JUDGE

Selman Breitman LLP
ATTORNEYS AT LAW